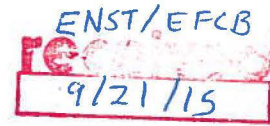




Clean Harbors Environmental Services, Inc.  
2247 South Highway 71  
Kimball, Nebraska 69145  
308.235.4012  
[www.cleanharbors.com](http://www.cleanharbors.com)



Sent via FedEx

September 18, 2015

Ms. Dedriel Newsome  
U.S. Environmental Protection Agency, Region VII  
300 Minnesota Avenue  
Kansas City, KS 66101

Re: August 18<sup>th</sup> – August 19<sup>th</sup>, 2015 EPA Inspection  
EPA ID Number: NED981723513

Dear Ms. Newsome;

On September 2, 2015, Clean Harbors Environmental Services, Inc. submitted to the USEPA a response to the August 18<sup>th</sup> – August 19<sup>th</sup>, 2015 EPA Inspection. In the response to Violation 4: 40 CFR 264.15 (c) and Permit Condition II.F.1. – Area 58 – cracks in T-145 pedestals and rusting peeling tank, CHESI mentioned that in a separate cover a third party certification of the condition of Area 58 tanks would be submitted. Please find that certification enclosed with this letter.

Should you have any questions please feel free to me, at 308-235-8260 or by email at [grow.jessica@cleanharbors.com](mailto:grow.jessica@cleanharbors.com).

Sincerely,

A handwritten signature in blue ink that reads "Jessica Grow".

Jessica Grow  
Compliance Manager  
[Grow.jessica@cleanharbors.com](mailto:Grow.jessica@cleanharbors.com)

September 8, 2015

To Whom It May Concern

RE: Area 58 Notice of Violation (Tank T-145) - Clean Harbors, Kimball Facility

This letter is to serve as a third party assessment relating to a Notice of Violation noted for Tank T-145 in the Area 58 tank farm located at the Clean Harbors facility located south of Kimball, Nebraska. This assessment is based on:

- an on-site review of the Area 58 tank farm, and
- witnessing of UT measurements taken at locations on the exterior of tank T-145, and
- a review of retirement thickness requirements from routine UT testing information.

**Tank Coating:**

A number of areas on the tank's exterior surface with varying degrees of distress were noted. The areas ranged from having no coating and the tank surface being unprotected to having partially adhered coatings. The areas exhibited varying degrees of oxidation; however, surface damage was limited to superficial rust. Two areas were noted where it appeared plates had once been attached and removed previous to the most recent coating application. These areas exhibited minor pitting; however, the coating system was intact.

While oxidation has occurred to the tank shell in the areas in question, the degree of actual deterioration of the metal is considered superficial. UT measurements in the areas in questions indicated material thicknesses exceeding 0.700-inch for the dome and 0.600-inch for the shell. These thicknesses are consistent with the UT measurements obtained in September 2014 during the annual testing.

The retirement thickness of the tank components is 0.250-inch. Retirement thickness is defined as the minimum shell thickness that allows the vessel to function as designed. Any increase in the thickness of the tank materials beyond the retirement thickness is considered the tank's corrosion allowance. This excess material is sacrificed during the life of the tank.

**Concrete Encasement – Tank Support Leg:**

Minor cracking of the concrete fire protection encasement surrounding the steel support column at the northwest corner of the tank was noted.

The concrete encasement serves as fire protection for the support columns and does not contribute to the support of the tank. The structural integrity of the tank has not been compromised by the cracking.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions please don't hesitate to contact our office (308)632-3123.

Very truly;

Baker & Associates, Inc.

By   
Russel J. Colby P.E. NE-6649



RJC:rc

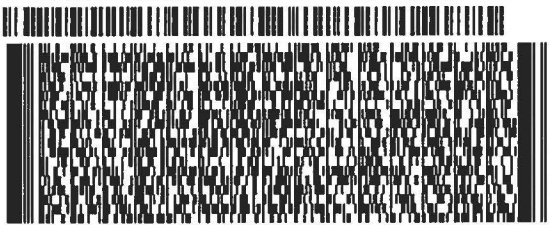
ORIGIN ID: BFFA (308) 235-8212  
KELLY WHITTLESEY  
2247 SOUTH HIGHWAY 71  
KIMBALL, NE 69145  
UNITED STATES US

SHIP DATE: 18SEP15  
ACTWGT: 1.00 LB  
CAD: 106186631/INET3670  
BILL SENDER

TO **MS. DEDRIEL NEWSOME**  
**EPA REGION VII**  
**300 MINNESOTA AVENUE**

**KANSAS CITY KS 66101**  
(913) 551-7049 REF.  
INV. PO DEPT

539.12/CB8931D0



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